

**AFFIDAVIT OF W.D.**

STATE OF NEW YORK     )  
  ) ss:s.  
COUNTY OF ROCKLAND    )

W.D., having been duly sworn, hereby states and deposes  
under the pains or perjury:

1. I am an adult of legal age, one of the plaintiffs in this matter  
and make the following statements to my personal knowledge.

2. My wife and I have been a parents at Green Meadow  
Waldorf School (GMWS) for the past fourteen years. Our four  
children have been excluded from GMWS since December 7, 2018  
per the exclusion of the Department of Health (DOH) as we have  
chosen not to vaccinate our children due to our religious beliefs.

3. My wife is a graduate of GMWS where she attended school  
from 4<sup>th</sup> grade through graduation and as a family we are  
committed to Waldorf education due its holistic "worldview"  
approach to a syllabus which includes music, languages, dance,  
art, nature programs and traditional academic subjects such as  
math and science.

4. Underpinning the Waldorf syllabus is a **spiritual philosophy based in Christianity of ethical tolerance and respectful integration** which, we believe, will better prepare our children for the world we live in. In addition, this spiritual philosophy respects and supports parents like us, who have chosen not to vaccinate their children due to our religious beliefs. Our family has four approved religious exemptions from the school due to our Christian beliefs.

5. Our eldest daughter, in 9<sup>th</sup> grade, was able to return to school on January 2019 when the High School reopened to excluded students due to the High School having a vaccination rate of over 95%. She was not vaccinated and remains unvaccinated.

6. However, for the remaining three children, and frankly our whole family, the last three months have been extremely disruptive and traumatic as we have been forced, at short notice, to create as best we can, a “mirror” syllabus and learning experience consisting of a home education with tutoring from stand in tutors and teachers. Our children have **arbitrarily been ripped out of the**

**integrated and inclusive social fabric of the classroom** that is fundamental to a healthy school education.

7. To add salt to the wound, the lack of any cohesive information or plan from the County DOH has been disheartening, frustrating and lacking in plain common sense. How is that children excluded from school can co-mingle freely at the mall, library etc. after school?

8. As a family we are accustomed to making numerous sacrifices in order for our children to attend GMWS – a private school. If our situation were to change (tutoring, financial, etc.), and we had to choose a new school, we would apply to the Mountain Laurel Waldorf School in New Paltz, NY. This would mean thousands of dollars in extra tuition, and twenty hours or more a week of commuting, or possible re-location, but we would do that before entertaining the idea of a non- Waldorf education or vaccination for our children.

9. The current order trammels our religious beliefs and disallows us from choosing a private school for our children, one

responsive to our values and needs. For these reasons, we join with others, seeking judicial intervention.



\_\_\_\_\_  
W.D.

Signed and sworn to before me this \_\_\_\_ day of March 2019.

  
\_\_\_\_\_  
NOTARY PUBLIC

My commission expires:

**MICHAEL HOWARD SUSSMAN**  
Notary Public, State of New York  
No. 02SU6332584  
Qualified in Orange County  
Commission Expires Nov. 09, 2019